

CHAITMAN LLP

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Presentment Date: March 13, 2020 12:00 PM

Objection Date: March 6, 2019

Attorneys for Defendants Train Klan, a Partnership; Felice T. Londa, in her capacity as a Partner in Train Klan; Claudia Helmig, in her capacity as a Partner in Train Klan; Timothy Landres in his capacity as a Partner in Train Klan; Jessica Londa, in her capacity as a Partner in Train Klan; Peter Londa, in his capacity as a Partner in Train Klan; Timothy Helmig, in his capacity as a Partner in Train Klan; and Wendy Landres; in her capacity as a Partner in Train Klan

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-04905 (SMB)

v.

TRAIN KLAN, A PARTNERSHIP; FELICE T.
LONDA, in her capacity as Partner in Train Klan;
CLAUDIA HELMIG, in her capacity as a Partner in
Train Klan; TIMOTHY LANDRES, in his capacity
as a Partner in Train Klan; JESSICA LONDA, in her
capacity as a Partner in Train Klan; PETER LONDA,

in his capacity as a Partner in Train Klan; TIMOTHY
HELMIG, in his capacity as a Partner in Tran Klan;
and WENDY LANDRES, in her capacity as a Partner
in Train Klan,

Defendants.

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to Withdraw as Counsel, dated February 21, 2020 Chaitman LLP, attorney of record for Defendants, Train Klan, a Partnership; Felice T. Londa, in her capacity as a Partner in Train Klan; Claudia Helmig, in her capacity as a Partner in Train Klan; Timothy Landres in his capacity as a Partner in Train Klan; Jessica Londa, in her capacity as a Partner in Train Klan; Peter Londa, in his capacity as a Partner in Train Klan; Timothy Helmig, in his capacity as a Partner in Train Klan; and Wendy Landres; in her capacity as a Partner in Train Klan (the “Defendants”) in the two above Adversary Proceedings, will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on March 13, 2020 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and

objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: February 21, 2020
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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